1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 ANIMAL LEGAL DEFENSE FUND, 10 Plaintiff, Case No. 3:18-cv-06025-RSL 11 v. STIPULATED MOTION FOR RELIEF 12 OLYMPIC GAME FARM, INC., ROBERT FROM DEADLINES AND ORDER 13 BEEBE, JAMES BEEBE, and KENNETH BEEBE, 14 Defendants. 15 16 I. **MOTION** 17 Pursuant to Local Civil Rule 7(j), Plaintiff Animal Legal Defense Fund ("ALDF") 18 19 respectfully requests the Court extend the deadline for filing dispositive motions and Daubert 20 motions by fifteen minutes, i.e., to 12:15 am on March 26, 2021. Defendants have stipulated to 21 this relief. 22 II. STATEMENT IN SUPPORT 23 24 The undersigned counsel for ALDF experienced technical difficulties finalizing and filing 25 some of the papers supporting ALDF's motion for summary judgment and Daubert motion, 26 which delayed the filing and service to just after midnight on March 25, 2021. The short delay 27 has not caused any prejudice and will not impact the case schedule. 28 29 SMITH & LOWNEY, P.L.L.C. STIPULATED MOTION FOR RELIEF FROM 2317 East John Street **DEADLINES** SEATTLE, WASHINGTON 98112

(206) 860-2883

No. 3:18-cv-06025-RSL-1

RESPECTFULLY SUBMITTED and stipulated to this 30th day of March, 2021. 1 **SMITH & LOWNEY, PLLC** 2 3 By: /s/Claire E. Tonry Claire E. Tonry, WSBA No. 44497 4 Attorneys for Plaintiff 5 2317 E. John St., Seattle, WA 98112 6 Tel: (206) 860-2124; Fax: (206) 860-4187 E-mail: claire@smithandlowney.com 7 Attorneys for Plaintiff 8 9 STOEL RIVES LLP 10 11 /s/ Jason T. Morgan Jason T. Morgan, WSBA No. 38346 12 jason.morgan@stoel.com Aric H. Jarrett, WSBA No. 39556 13 aric.jarrett@stoel.com 14 James C. Feldman, WSBA No. 51271 james.feldman@stoel.com 15 600 University Street, Suite 3600 Seattle, WA 98101 16 Telephone: 206.624.0900 17 Attorneys for Defendants 18 19 20 21 22 23 24 25 26 27 28

STIPULATED MOTION FOR RELIEF FROM DEADLINES
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SMITH & LOWNEY, P.L.L.C. 2317 EAST JOHN STREET SEATTLE, WASHINGTON 98112 (206) 860-2883

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2	ORDER
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4	The Court, having considered Plaintiff Animal Legal Defense Fund's stipulated motion
5	for relief from deadlines, hereby GRANTS Plaintiff's motion. The deadlines for dispositive
6	motions and Daubert motions is extended by fifteen minutes, to 12:15 am on March 26, 2021.
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8	Dated this 21st day of March, 2021
9	Dated this 31st day of March, 2021.
10	MMS (asnik HONORABLE ROBERT S. LASNIK
11	HONORABLE ROBERT S. LASNIK UNITED STATES DISTRICT JUDGE
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14	Presented by:
15	/s/Claire E. Tonry Claire E. Tonry, WSBA No. 44497 Attorneys for Plaintiff 2317 E. John St., Seattle, WA 98112 Tel: (206) 860-2124; Fax: (206) 860-4187 E-mail: claire@smithandlowney.com
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29	CTIDLIL A TED MOTION FOR DELICE FROM SMITH & LOWNEY BLLC

STIPULATED MOTION FOR RELIEF FROM DEADLINES
No. 3:18-cv-06025-RSL- 3

SMITH & LOWNEY, P.L.L.C. 2317 EAST JOHN STREET SEATTLE, WASHINGTON 98112 (206) 860-2883